

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

HERITAGE GUITAR, INC.,

Plaintiff,

v.

GIBSON BRANDS, INC.,

Defendant.

Case No. 20-cv-229

Honorable Hala Y. Jarbou

Magistrate Judge Ray Kent

DECLARATION OF VINITA FERRERA

I, Vinita Ferrera, declare:

1. I am a partner at Wilmer Cutler Pickering Hale and Dorr LLP. I am one of the attorneys representing Plaintiff Heritage Guitar, Inc. (“Heritage”) in this matter. I have personal knowledge of the following facts, and if called to do so, I could and would testify truthfully to the facts set forth in this declaration.

2. Exhibit A is a true and accurate excerpt from the deposition transcript of Bruce Mitchell, which took place on June 30, 2022, in connection with this matter.

3. Exhibit B is a true and accurate of a declaration by Timothy Shaw, signed on May 11, 2022, in connection with this matter.

4. Exhibit C is a true and accurate excerpt from the deposition transcript of Timothy Shaw, which took place on July 11, 2022, in connection with this matter.

5. Exhibit D is a true and accurate copy from the deposition transcript of Carl Hansen, which took place on March 16, 2022, in connection with this matter.

6. Exhibit E is a true and accurate copy from the deposition transcript of David Nam Le, which took place on April 5, 2022, in connection with this matter.

7. Exhibit F is a true and accurate copy from the deposition transcript of Jim Deurloo, which took place on March 22, 2022, in connection with this matter.

8. Exhibit G is a Heritage Guitar brochure with Bates numbers HER_GIB_LIT_0000117 – HER_GIB_LIT_00001128.

9. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

September 9, 2022

WILMER CUTLER PICKERING HALE
AND DORR LLP

By: /s/ Vinita Ferrera
Vinita Ferrera

Attorney for Plaintiff Heritage Guitar, Inc.